

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JULIE DALESSIO, an individual,

Plaintiff,

v.

UNIVERSITY OF WASHINGTON,

Defendant.

No. 2:17-cv-00642-RSM

DECLARATION OF DEREK C. CHEN
IN SUPPORT OF DEFENDANT'S
RESPONSE TO PLAINTIFF'S
MOTION TO STRIKE

I, Derek C. Chen, declare as follows:

1. I am one of the attorneys representing the Defendant in this lawsuit. I make this declaration based upon my own personal knowledge, upon facts which are admissible in evidence. I am competent to testify to the matters set forth in this declaration.

2. To Defendant's knowledge, Plaintiff has never "designated" any specific documents as "confidential" through any kind of official tag or designation.

3. The original redactions to PR 15-00570 were made by Alison Swenson, a compliance analyst for the University of Washington, prior to producing the documents in response to a public records request. Counsel for Defendant then made additional redactions using black boxes for purposes of filing the subject documents in court, some of which had writing describing what was underneath the redaction, pursuant to WDLC 5.2(a).

4. The following exhibits are cited or relied upon in Defendant's Response to Plaintiff's Motion to Strike:

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

/s/ Derek C. Chen

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